



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

February 21, 2006

Mr. Mark Mendelsohn  
U. S. Army Corp of Engineers  
Baltimore District, Planning Division  
P.O. Box 1715  
Baltimore, MD 21203

RE: Baltimore Harbor and Channels (MD and VA) Dredged Material Management Plan (DMMP) and Final Tiered Environmental Impact Statement (FTEIS) CEQ No. 20060013

Dear Mr. Mendelsohn:

In accordance with the National Environmental Policy Act of 1969 (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the Final Tiered Environmental Impact Statement (FTEIS) for the above referenced project.

EPA concurs with the recommended DMMP described in the FTEIS and the response to our comments on the Draft Tiered EIS. Recently completed and ongoing NEPA studies of alternatives considered in the DMMP EIS (e.g., the Poplar Island Expansion and the Masonville Cove Confined Disposal Facility), prepared in conjunction with interagency and public input, have significantly enhanced those alternatives as part of the DMMP. Additional follow up studies and detailed analyses of other specific alternatives, as recommended, has the potential to reduce environmental impacts while enhancing beneficial uses. Any future Environmental Impact Statement (EIS) developed for specific dredging and disposal projects should include a detailed cumulative impacts analysis that addresses not only dredging activities, but any reasonably foreseeable large scale development activities (e.g., transportation projects, commercial and residential development, energy projects, and military plans) within the Chesapeake Bay that could impact dredged material management options.

EPA again strongly endorses the development of beneficial uses and innovative approaches for dredged material management as part of the DMMP. As we noted in our comments on the Draft TEIS, the placement of material to protect and enhance the wetlands on the Dorchester County Blackwater Wildlife Refuge should be a priority. Every consideration should be made to exploring this alternative as funds become available through the Water Resources Development Act or other funding vehicles.

We must reiterate the need for periodic re-evaluation of open water placement in Virginia to include the Norfolk Ocean Placement Site as a potential viable alternative for the placement of clean dredged material. This site has been EPA approved and has significant reserve capacity to accommodate much of the future maintenance dredging needs for the Virginia approach channels. We also applaud the Corps' acknowledgment of the need for control of non-point sources of sediments from the Upper Chesapeake Bay Watershed, especially the potential impacts of, and solutions to, the sediment in the reservoirs behind the lower Susquehanna River dams and the erosion of the Chesapeake Bay shorelines. Reduction of sediment inputs to the Chesapeake Bay is a major goal of the Chesapeake Bay Agreement that may have the added benefit of reducing the need for future dredging.

EPA looks forward to the productive and continued participation in the DMMP process. Thank you for the opportunity to assess the DMMP and FTEIS. Should you have any questions regarding these comment, please contact Thomas Slenkamp, Deputy Branch Chief, at (215) 814-2750 or Marria O'Malley Walsh of my staff at (570) 628-9685.

Sincerely,

A handwritten signature in black ink, appearing to read 'W. J. Hoffman', with a long horizontal flourish extending to the right.

William J. Hoffman, Chief  
Environmental Programs Branch